

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., et al. ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 1070

**CERTIFICATION OF COUNSEL REGARDING DEBTORS'
FIFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)
(Reclassified Claims)**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On June 4, 2025, the *Debtors’ Fifth Omnibus Objection to Certain Claims (Substantive) (Reclassified Claims)* [Docket No. 1070] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the “Proposed Order”).
2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was June 25, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).
3. Prior to the Response Deadline, the Debtors received an informal response to the Objection and Proposed Order from Rosenthal & Rosenthal, Inc. (“Rosenthal”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

4. Additionally, prior to the Response Deadline, the Debtors received a formal response to the Objection and Proposed Order from Notions Marketing Corporation [Docket No. 1281] (the “Notions Response”).

5. The Debtors have not received any other informal or formal responses to the Objection and Proposed Order.

6. To resolve Rosenthal’s informal response,² the Debtors and Rosenthal agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit A** (the “Revised Proposed Order”).

7. The Debtors respectfully request that the Court enter the Revised Proposed Order at its earliest convenience.

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² The unresolved Notions Response has been adjourned to the omnibus hearing currently scheduled for August 14, 2025 at 10:00 a.m. (prevailing Eastern Time).

Dated: July 9, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
Michael E. Fitzpatrick (No. 6797)
Jack M. Dougherty (No. 6784)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com
snewman@coleschotz.com
mfitzpatrick@coleschotz.com
jdougherty@coleschotz.com

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP
Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
Aparna Yenamandra, P.C. (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: joshua.sussberg@kirkland.com
aparna.yenamandra@kirkland.com

- and -

Anup Sathy, P.C. (admitted *pro hac vice*)
Jeffrey Michalik (admitted *pro hac vice*)
Lindsey Blumenthal (admitted *pro hac vice*)
333 West Wolf Point Plaza
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: anup.sathy@kirkland.com
jeff.michalik@kirkland.com
lindsey.blumenthal@kirkland.com

*Co-Counsel to the Debtors
and Debtors in Possession*

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and Debtors in Possession*